

APPENDIX A

Letter in Response to Request Waivers of Certain Federal Travel Regulation Requirements

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Administrator
General Services Administration
Washington, DC 20405

June 14, 1996

Ms. Bonnie R. Cohen
Assistant Secretary
Policy, Management and Budget and
Chief Financial Officer
Office of the Secretary
Department of the Interior
Washington, DC 20240

Dear Ms. Cohen:

This letter is in response to your correspondence dated March 29, 1996, requesting on behalf of the Department of the Interior (DOI) waivers of certain Federal Travel Regulation (FTR) (41 CFR chapters 301-304) provisions, and to clarification received pursuant to conversations between our respective staffs. In general, I am waiving those provisions which are under the purview of the General Services Administration (GSA). It is not within my authority, however, to waive statutory provisions, nor to create new rules or entitlements by waiver. I may waive only conditions on existing rules and entitlements. Your requests are separately addressed in items numbered 1 through 4 below.

1. Exemption from reporting arrival and departure times on travel claims, and computing subsistence reimbursements in quarter day increments.

a. FTR § 301-7.2 - Requirement for travelers to record times on vouchers.

You request a waiver of the portion of FTR § 301-7.2 which requires an employee to record the time of departure from and arrival at any place where official travel begins or ends. You have also requested a waiver (as indicated in item 1(b), below) of the requirement to prorate subsistence reimbursement in quarter-day increments, indicating that you will instead pay a flat 75 percent of the meals and incidental expenses (M&IE) allowance on the first and last days of travel of more than 24 hours.

Since I am granting the waiver you request in item 1(b), below, to allow a flat M&IE payment on the first and last days of travel for travel of more than 24 hours, I hereby grant,

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for travel of more than 24 hours, the waiver you request of FTR § 301-7.2(a)(2).

However, I am unable to grant your request to waive FTR § 301-7.2(a)(2) for travel of 24 hours or less for the following reason. FTR § 301-7.7 requires per diem payments for travel of 24 hours or less to be based on the quarter-day system, and FTR § 301-7.5 prohibits the payment of per diem for travel of 10 hours or less. An agency must know the time that travel begins and ends to determine whether an employee qualifies for per diem, and if so, the amount of per diem to which the employee is entitled. I therefore cannot grant the waiver you request of FTR § 301-7.2(a)(2) for travel of 24 hours or less.

(b) FTR § 301-7.8 - Requirement that travel reimbursement on partial (beginning and ending) days of travel be calculated on a quarter-day basis

You request a waiver of the portion of FTR § 301-7.8 which requires the M&IE portion of subsistence reimbursement to be prorated in quarter-day increments when travel exceeds 24 hours. You state that the DOI will pay a flat three-fourths of the M&IE allowance on the first and last days of travel.

I hereby waive the portion of FTR § 301-7.8 including subsections (a), (c)(3), and (e), which requires M&IE on the beginning and ending days of travel which exceeds 24 hours to be prorated on a quarter-day basis. The DOI may, pursuant to FTR §§ 3017.10 and 301-7.12, authorize a reduced flat M&IE allowance for these situations, i.e., partial days of travel, because the DOI has determined in advance that three-fourths of the M&IE rate is commensurate with expenses to be incurred by employees.

2. Exemption from specific requirements impacting travel authorizations and travel vouchers.

You request a waiver of the portion of (a) FTR § 301-1.102(a)(2) which requires that limited open authorizations be reviewed and revalidated at least quarterly, (b) FTR § 301-1.102(b) which requires trip-by-trip authorization for conferences, meetings, training, and foreign travel, (c) FTR § 301-1.102(c) which requires each travel authorization to specify the purpose(s) of the travel, and (d) FTR § 301-1.102(d) which requires travel authorizations include estimates of the cost of travel, and that agencies use these estimates to obligate the funds necessary to carry out that particular travel to improve travel budgetary controls. You state that you would establish the necessary controls to ensure that authorizations are canceled when not needed, or upon separation of an employee, and that information relating to the special purpose travel and the trip purpose would be required on DOI's travel vouchers.

It is the policy of the Federal Government that agencies shall authorize only that travel

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which is necessary to accomplish the purposes of the Government effectively and economically (FTR § 301-1.101(a)), and it is the responsibility of the agency to authorize or approve only that travel necessary to accomplish the agency mission in the most effective and economical manner (FTR § 301-1.101(b))- GSA is required by law (5. U.S.C. 5707(c), as amended by Pub. L. 103-329, Sept. 30, 1994) to gather data which can be used to develop a profile of Federal employee travel and relocation, and to submit a report at least every two years to the Office of Management and Budget by a letter dated October 6, 1995 (copy enclosed), your agency was informed of the data elements that GSA will be collection for Fiscal year 1996.

I hereby grant your request for a waiver of the portion of (a) FTR § 301-1.102(a)(2) which requires that limited open authorizations be reviewed and revalidated at least quarterly, (b) FTR § 301-1.102(b) which requires trip-by-trip authorization for conferences, meetings, training, and foreign travel, © FTR § 301-1.102(c) which requires each travel authorization to specify the purpose(s) of the travel, and (d) FTR § 301-1.102(d) which requires travel authorizations include estimates of the cost of travel, and that agencies use these estimates to obligate the funds necessary to carry out that particular travel to improve travel budgetary controls. Additionally, I hereby waive the requirement in FTR § 301-1.101 (b)(3) that each employees travel shall be authorized separately under specific guidelines provided in § 301-1.102. I grant this waiver contingent on DOI establishing appropriate procedures to collect the required reporting data elements described above.

3. Exemption from the use Standard Form (SF) 1012 and required attachments.

- a. You request a waiver of FTR § 301-11.3(a) which requires that all claims for the reimbursement of traveling expenses be submitted on authorized reimbursement forms and must be itemized and stated in accordance with the FTR unless, for special reasons, compliance with specific requirements has been waived or modified by written determination of the administrator of General Services. You state that the DOI is considering using Travel Management Centers (TMCs) to assist travelers in preparing travel claims, and you request an exception to SF 1012, Travel Voucher.

Pursuant to a conversation between our respective staffs, the DOI would establish an automated travel system similar to the one currently piloted by the Department of State (State). State has also designed a one-document travel system. This document incorporates the travel authorization, travel voucher and travel advance, which is to be used when the automated system cannot be used. In its efforts to improve travel management Government wide, the Joint Financial Management Improvement Program (JFMIP) distributed proposed standard data elements for use in automated travel systems, as well as on a proposed optional form, to assist agencies. You state that the DOI will use

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these proposed standard data elements in developing an automated travel system. An automated system will provide a central repository for travel data, easing the retrieval of required reporting requirements. I commend your efforts to explore alternative formats for the improvement of the DOI's administration of travel. To assist the DOI with flexibility in negotiating with the TMCs for the establishment of an automated system, I hereby waive the portion of FTR § 301-11.3(a) which requires that all claims for the reimbursement of traveling expenses shall be submitted on authorized reimbursement forms. GSA hereby grants an exception to SF 1012, Travel Voucher, provided that DOI includes the same standard data elements as distributed by the JFMIP and that you provide GSA with a copy of DOI's new travel claims format.

b. FTR § 301-11.3(b)-Requirement to attach a copy of the travel authorization to the travel voucher

You request a waiver of FTR § 301-11-3(b) which requires that the travel voucher must be supported by a copy of the travel authorization, and that if the travel authorization has been filed or attached to a previous voucher, reference to the previous voucher be made. You state that DOI would reference the travel authorization number and date to provide a sufficient audit trail to verify the necessary documentation. I hereby grant your request.

c. FTR § 301-7.9(b), 301-11.3(c) and 301-11.5-Receipt requirements for lodging airline tickets and other expenses.

You request a waiver of the portion of FTR § 301-7.9(b) which requires an employee to submit receipts for all lodging expenses claimed, and of FTR § 301-11.3(c) which requires receipts for allowable cash expenditures in amounts in excess of \$75 and for other expenses regardless of the amount. You state that audit requirements can be accomplished most economically by reviewing electronic records from TMCs and the government-sponsored charge card rather than from hard copy receipts attached to travel vouchers.

Contingent upon the DOI's requiring employees to retain for three years receipts for lodging expenses which exceed \$75, I hereby grant a waiver of the portion of FTR § 301-7-9(b) which requires the submission of receipts to support all lodging expenses and of FTR § 301-11.3(c) which requires receipts for allowable cash expenditures in amounts in excess of \$75 and for other expenses.

FTR § 301-11.5 requires submission of a receipt or passenger coupon to support a reimbursement claim for cash payment of authorized passenger transportation services. You state that DOI travel vouchers containing reimbursement for passenger transportation

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services procured with cash will continue to be supported with a copy of the ticket and forwarded to GSA for audit in accordance with Federal Property Management Regulations (FPMR) (41 CFR chapter 101) § 101-41.203-2(b)(3) which require agencies to submit to GSAs Office of Transportation Audits passenger transportation service ticket coupons costing more than \$100 and procured using cash. This procedure is required for GSA to complete the statutorily required audit.

4. Exemption from detailed reimbursement rules.

- a. FTR § 301-3.1(b)-Reimbursement for tips to taxi drivers, which allows reimbursement of taxicab tips in the amount of 15 cents when the fare is \$1 or less or 15 percent of the reimbursable fare when it exceeds \$1.

You request a waiver of the allowable reimbursement of taxicab tips in the amount of 15 cents when the fare is \$1 or less or 15 percent of the reimbursable fare when it exceeds \$1. You state that DOI believes an employee should be entitled to reimbursement for any reasonable tip based on the circumstances.

I hereby grant a waiver of FTR § 301-3.1(b) which allows reimbursement of taxicab tips in the amount of 15 cents when the fare is \$1 or less or 15 percent of the reimbursable fare when it exceeds \$1. The DOI in implementing agency policy for reimbursement of taxicab tips should place a monetary limit on the amount of taxicab reimbursement to ensure that reimbursements are authorized only when justifiable and when all circumstances are met.

- b. FTR § 301-3.2(e)-Reimbursable charges for rental of autos and special conveyances, which requires that when two or more persons travel together by means of a rented vehicle or special conveyance, that fact, together with the name of each traveler and the name of his/her employing agency, must be stated by each traveler on his/her travel voucher.

You request a waiver of FTR § 301-3.2(e) which requires that travelers' claims for reimbursement accurately reflect the facts involved and you state that the requirement to list the names and employing agency of each person sharing a rental vehicle or special conveyance unnecessarily adds cost and administrative burden without providing corresponding benefits.

It is the responsibility of each Federal agency to eliminate unnecessary Federal spending on travel by strengthening agency controls over the authorization and approval of travel at Government expense. The requirement in FTR § 301-3.2(e) to list the names and employing agency of each person sharing a rental vehicle or special conveyance helps to eliminate the potential for fraud and abuse if an employee should share the vehicle with

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family and/or friends, to justify additional expense for employees of other agencies, to curtail the potential for more than one employee claiming an expenditure of the rental vehicle or special conveyance, and to avoid conflicts of interest and to comply with Government ethics rules in situations when a contractor might share the vehicle. I hereby grant a waiver of FTR § 301-3.2(e) contingent upon the DOI's internal policies include standards for dealing with the employee's own and other financial interests that conflict with the performance of an employee's official travel duties.

I am committed to reinventing Federal travel and commend your efforts to improve your travel accounting system.

Sincerely,

David J. Barram
Acting Administrator

Enclosure